

Ehren, In addition to my original comments, I would like to submit the following “comments on the comments”:

- The study should analyze NEM from both Export-Only and All-Output/All-Generation perspectives. Limiting the study to the entire output of NEM systems, as proposed by SDG&E and PG&E, would unfairly prejudice the results of the study.
- T&D Upgrade Costs are Minimal or Non-existent for Interconnecting Solar at the Studied Penetration Levels.

Thank you.

Rick Brown, PhD, President

TerraVerde Renewable Partners

1100 Larkspur Landing Circle, Suite 155

Larkspur, CA 94939

1-707-953-2885

Rick.Brown@TVRPLLC.COM

Skype Address: Rick.BrownTVRP

<http://www.tvrpllc.com/>

